

# Exhibit B

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

R. McAllister, et al.	)	
Plaintiffs,	)	
	)	
v.	)	No. 4:16CV-00172SNLJ
	)	
St. Louis Rams, LLC	)	
Defendants.	)	

Fernando Bermudez Declaration

My name is Fernando Bermudez. I am an attorney at Bermudez Law STL, LLC and have personal knowledge of all facts in this declaration.

1. I am an attorney of record in *McAllister v. St. Louis Rams, LLC*, No. 4:16-cv-172 SNLJ, Judge Stephen N. Limbaugh, Jr. presiding.

2. The Court appointed me as one of the lead counsels to represent Personal Seat License holders whose PSLs were governed by the St. Louis Rams Regular Patron CPSL Agreement.

3. In prosecuting this case, I have worked closely with Martin M. Green of Law Offices of Martin M. Green, P.C. and David R. Bohm of Danna McKittrick, P.C. Bohm will file a separate declaration concerning his firm's fees and expenses.

4. The three law firms have accrued considerable expenses in prosecuting this case. Bermudez and Green have collectively incurred all of the following expenses which have been paid in full and have no outstanding balance. As of February 28, 2019, these expenses include:

Filing fee .....	\$104.40
West Law .....	\$9,970.02
Sports Business Group .....	\$14,500.00
Service fees re: Petition .....	\$50.00

Service and witness fees re Legends subpoena March 2017 .....	\$171.72
Victus Advisors.....	\$48,487.50
Analysis Group, Inc. - Strombom deposition fee .....	\$1,536.60
Armstrong Teasdale (mediation) .....	\$1,057.47
Armstrong Teasdale (mediation II).....	\$3,219.64
Witness fee - Greg Kish (Legends).....	\$46.72
Matthew Estlund - data analysis .....	\$150.00
Federal Express - .....	\$110.82
Travel expenses - Demoff deposition 7/11/17.....	\$1,435.37
Travel expenses - Demoff deposition 1/23/18.....	\$1,103.75
Travel expenses - Strombom deposition.....	\$1,474.44
Travel expenses - Kish deposition (3/21-22/18).....	\$1,055.95
Travel expenses - Legends motion hearing (5/22-23/18) .....	\$954.95
Travel expenses- May 9-11 trip cancelled (airfare) .....	\$323.98
Tesser Grossman, LLP - LA local counsel .....	\$7,925.45

#### Deposition transcripts

D. Jaenke	\$164.18
S. Bohm	\$149.19
R. Bohm	\$195.85
E. Mock	\$243.28
R. Cochran	\$157.33
B. Pearlman	\$187.76
R. Arnold	\$258.59
K. Demoff	\$619.75
K. Demoff II	\$3121.65
G. Kish	\$657.90
S. Hunt	\$111.35
B. Kriegler	\$348.90
B. Strombom I	\$1094.25

B. Strombom II	\$298.00
Sam Korn - data analysis .....	\$125.00
Legends Hospitality (third party discovery reimbursement) .....	\$50,000.00
<b>TOTAL .....</b>	<b>\$151,411.76</b>

5. All of these expenses were reasonably incurred and reflect market rates.
6. None of these expenses have been reimbursed nor will they be outside this case's settlement agreement concerning costs and expense reimbursement.
7. As of February 28, 2019, I have billed 1315.90 hours of attorney time prosecuting this case since January 2016.
8. As of December 31, 2018, Martin M. Green has billed 65.15 hours of attorney time prosecuting this case since January 2016.
9. All time we expended has been reasonably calculated to zealously represent our clients. I expect to bill considerably more time as this settlement goes through administration and court approval. Because the amount of time depends largely on: A) how much assistance class members need in making claims; B) the number of challenges that the Rams and the claims administrator may make to the claims; and C) the objections that third parties may raise, it is impossible to predict accurately how much more time I will billed.
10. Our billing rate for these types of cases is \$650/hour. This rate is market driven and, based on information and belief, is less than the hourly rate billed by the primary opposing counsel in this case. Thus, the lodestar for Bermudez and Green is \$897,682.50.

I, Fernando Bermudez, state that the preceding factual statements are based upon person knowledge and are true to the best of my knowledge under penalty of perjury under 28 U.S.C. §1746.

Dated: March 12, 2019

